

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

- ☐ FORM 1.0 GENERAL PLANT INFORMATION
- ☒ FORM 1.1 PROCESS FLOW DIAGRAM
- ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
- ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
- ☒ FORM 2.0 EMISSION POINT INFORMATION
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- ☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
- ☐ FORM 3.0 EMISSIONS FEE CALCULATION
- ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
- ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
- ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
- ☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

I WOULD BE ABLE TO BE LESS EFFECTIVE IN DOING MY JOB.
INCREASING THE LEVELS WOULD CAUSE MORE GAPS IN WHAT THE INSTALLATION IS DOING, EMISSION POINTS WOULD APPEAR AND DIS APPEAR FROM YEAR TO YEAR IN PARTICULAR AS THE LEVEL IS BASED ON ACTUAL & NOT POTENTIAL EMISSIONS

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No

If so, where is it located?

MOBILE HAS INFORMATION IN IT BUT IT REALLY SUCKS TRYING TO GET IT OUT IN A USEFUL FORMAT.

5. Do you have any suggestions or comments?

THE REAL QUESTION IS WHY SHOULD THE LEVEL BE RAISED?
IF IT IS TO MAKE COMPLETING THE EIQ EASIER AND LESS BUREAUCRATIC THEN IT MAY OR MAY NOT BE THE BEST APPROACH. A CLOSE EXAMINATION OF WHICH TYPES OF SOURCES INVOLVED AT VARIOUS LEVELS SHOULD BE EXAMINED BEFORE MAKING A PROPOSAL AND A VARIETY OF OTHER OPTIONS ARE POSSIBLE THAT MIGHT BE BETTER WITHOUT CHANGING THE LEVEL.

FEEDBACK
PERMITS
COMMENT

3. A NUMBER OF EMISSION SOURCES MAY NOT BE REPORTED SIMPLY BECAUSE THEY ARE NOT USED VERY MUCH (e.g. CONCRETE PLANT YARDS) OR BECAUSE OF THE VOLUME OF A LOW EMISSION FACTOR. THE LOSS OF INFORMATION ON DETAILS ABOUT SMALL SOURCES AT AN INSTALLATION WOULD MAKE IT MUCH MORE DIFFICULT TO DETERMINE WHAT THE INSTALLATION'S POTENTIAL AND HOW AS OPPOSED TO SIMPLY FOCUSING ON TO IDENTIFY ANY EMISSION SOURCE ON THE FLOOR. THE LEVEL OF DETAIL IS ESPECIALLY IMPORTANT FOR LARGER SOURCES (MAJOR, SYNTHETIC MATERIALS) WHERE THERE ARE ^{POTENTIAL} VARIATIONS, MODERATION, INCARCERATION, NETTING ANALYSES ISSUES WHERE THE DETAILS ARE LOW LEVELS BECOME VERY IMPORTANT.

WON ABOUT EXISTENT AREAS
ALSO

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3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

Without knowing the "profile" of the emission inventory, it is impossible to speculate on the impact that an alteration to the reporting thresholds would have.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☒ Yes ☒ No
If so, where is it located?

Yes and no, some information is available from the Permit Section. However, permit applications rarely contain the entire inventory of sources that emit pollution at any particular facility.

5. Do you have any suggestions or comments?

- A. It is important to review the impact of any alterations to the emission inventory on a pollutant by pollutant basis and as a whole. Missouri has a diverse industrial base whose quantity and type of emissions varies by the products that are produced. The elimination of source categories based upon statistical results that are not comprehensive could result in large unanticipated data losses.
- B. Increment consumption within the State of Missouri is tracked on a point by point basis, not a facility wide basis. The amount of increment consumed or expanded is based upon the average two-year actual emissions from an emissions unit that is reported by a facility. The units included in the increment inventory are identified as only those points for which a construction permit was received after the minor source baseline date was established. A permanent reduction in the reporting thresholds could result in inaccuracies in the increment database that may directly impact the issuance of permits in the future, i.e. staff may have to rely on permitted potentials to track increment rather than the EIQ average actual emissions.
- C. A portion of the information contained in the EIQ is static and should not change from one year to the next, i.e. max design rates, stack parameters, etc. A requirement that mandates the completion of these fields on a yearly basis is redundant. Perhaps the forms could be preprinted with this information, or altered so that this information does not have to be submitted unless the facility undergoes a modification or increases production.
- D. The aggregation of all sources from a facility into a single ton per year number would make verification difficult. If the emissions from a storage pile were incorrectly calculated, the reviewer would not have enough information available to be able to locate where the error had occurred. Or, in many instances, errors may not be noted at all due to a lack of information. In addition, the Department's Air Pollution Control Program would not have the ability to correctly characterize the emission type in its review of air quality analyses. The dispersion characteristics of emissions from a stack driven source are much different than those that would result from a haul road.
- E. For smaller emitters, a periodic submittal of the full EIQ could be an alternative to the submittal of a full EIQ each year provided permitted limits do not change and no other modifications occur. This would result in a relaxation of the reporting requirements but would still give the Department's Air Pollution Control Program a database of information that could be used in the development of model inventories.

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3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

A couple of concerns here: First, for these relatively small sources, we are more concerned about their cumulative impact than how big each source is. If there were a way to aggregate without losing the information, that might be a way to go. Second, as we continue to look for candidate sources for emission control to solve problems involving St. Louis ozone, we may lose a category if the threshold were higher. Again, it is not a single source, but the prospect of losing a potential control target if there are many small sources. And if we don't make significant air quality progress, we may be faced at controlling smaller and smaller sources. If we are unaware of their existence, the burden may fall to larger industry, even though another option may be less expensive.

Also, we do not have a clear understanding of PM2.5 yet. Again, controlling small local sources may be helpful (but I think this is less likely than for ozone).

Also, when we write rules we are required to identify any effects we have on small businesses. While many of these small emission points are at large facilities, they also exist at smaller businesses. Losing this information may yield an incomplete picture of any regulatory impacts on small business.

Any loss in emission fees will have to be made up by higher fees for larger points.

There are permitting situations where the documentation of actual emissions is necessary. If something isn't reportable, then we won't have actual emissions for calculations of net emission increase. It may affect banking and trading.

Again, while small, these emissions are included in modeling exercises, both for permit modeling and for SIP modeling. As a general rule, the more accurate the emission inventory, the more reliable the model results.

There may be some rules that require recordkeeping for sources this small. I'm not aware of any, but we should ask the question. O.P. folks might know this.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ____ Yes ____ No
If so, where is it located?

Not aware of any.

5. Do you have any suggestions or comments?

Besides completely eliminating the reporting on these, there are other possible solutions. One would be to do the calculations less frequently. Another would be to provide a non-calculational estimate. And as I mentioned above, it would be best to aggregate the information.

It would be helpful to identify why these small sources are difficult to report. As an idea, instead of doing full-blown material balances, maybe we could ask facilities to develop some sort of activity related emission factor for these sources. Since they have done the rigorous calculations, it might not be too difficult for sources to develop their own emission factors. This would make reporting much simpler, because activity data is relatively easy to obtain compared to solvent usage data, for instance.

We may be able to do something like this for some of the larger sources, and this may be helpful as well.

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 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

Probably not too much difference since the Toxics threshold is the same.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☒ Yes ☐ No
If so, where is it located?
Stuff that should be in the permit, or is in previous year's EIQ.
5. Do you have any suggestions or comments?

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3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

This would reduce the number and accuracy of HAP emissions that we are able to document, track, report to the National Emission Inventory (NEI), consider when attributing sources of toxic emissions, evaluating public health effects and risks, & developing effective control strategies.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?

5. Do you have any suggestions or comments?

Although the EIQ is detailed and burdensome to complete, virtually all of the information it contains is essential to forming a complete record of emissions from the plant. The design of the EIQ is really quite impressive in its succinct and orderly compilation of the essential information. No doubt there is always room for some improvements and refinements, but I do not work closely enough with EIQs to have noticed any.

HAP emissions are particularly necessary at present since they are in the early stages of being compiled, compared with monitored levels, and evaluated for possible adverse health effects. Raising the reporting threshold would be very detrimental to this effort, particularly for many HAPs with high toxicities that could be causing adverse health effects at emission levels below even the current reporting threshold. Mercury is one example of a persistent, bioaccumulative, toxic chemical whose reporting threshold should be lowered to at least 10 pounds/year, preferably 1 lb/year. For highly accurate HAP emission inventories, it would be necessary to have no reporting threshold whatsoever.

In addition to the existence of reporting thresholds, the greatest information gap is that many facilities still do not report HAP emissions at all, or do an incomplete job of it. There is a very large number of facilities still not reporting their HAP emissions, perhaps roughly half of all facilities. HAP emissions represent a serious reporting burden, since if one HAP exceeds the reporting threshold, all HAPs, including those below the reporting threshold, should be reported. However, with the increasing use of MoEIS this burden should progressively become more manageable for all concerned. The goal should be an accurate and full accounting of HAP emissions on the part of all facilities.

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Such an increase in emission point reporting threshold will decrease the certainty of calculating the human health risks associated with these emissions.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?
5. Do you have any suggestions or comments? No.

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- It would decrease fee revenue.*
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- If so, where is it located?
5. Do you have any suggestions or comments?
- No.*

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 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☒ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

Not much either way.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?
5. Do you have any suggestions or comments?

Have MoEIS display a facility's prior or current emission year (if possible like on the plant's Form 1.0) when you select a company or a company goes online to check their facility data.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

☒ FORM 1.0 GENERAL PLANT INFORMATION
☒ FORM 1.1 PROCESS FLOW DIAGRAM
☒ FORM 1.2 SUMMARY OF EMISSION POINTS
☒ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
☒ FORM 2.0 EMISSION POINT INFORMATION
☒ FORM 2.0C CONTROL DEVICE INFORMATION
☒ FORM 2.0K CHARCOAL KILN INFORMATION
☒ FORM 2.0L LANDFILL INFORMATION
☒ FORM 2.0P PORTABLE PLANT INFORMATION
☒ FORM 2.0S STACK INFORMATION
☒ FORM 2.0Z OZONE SEASON INFORMATION
☒ FORM 2.1 FUEL COMBUSTION WORKSHEET
☒ FORM 2.2 INCINERATOR WORKSHEET
☒ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
☒ FORM 2.4 PETROLEUM LIQUID LOADING WORKSHEET
☒ FORM 2.5 ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
☒ FORM 2.5L GENERAL LIQUID STORAGE TANK INFORMATION
☒ FORM 2.6 ORGANIC LIQUID STORAGE, FLOATING-ROOF TANK WORKSHEET
☒ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
☒ FORM 2.8 STORAGE PILE WORKSHEET
☒ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
☒ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
☒ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
☒ FORM 3.0 EMISSIONS FEE CALCULATION
☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

I would leave the reporting threshold unchanged especially for HAPS.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

I don't know. But the EIQ is my first choice to find information about a facility.

5. Do you have any suggestions or comments?

I suggest that the reporting threshold be left as is. Modeling needs this information especially when there is a need for Increment or NAAQS evaluation.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. **Do you use any of the information collected on the emissions inventory questionnaire?** **Yes**

2. **What emissions inventory information or EIQ forms do you use?**
 - _____ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - _____ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
 - _____ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☒ FORM 2.0L LANDFILL INFORMATION
 - _____ FORM 2.0P PORTABLE PLANT INFORMATION
 - ☒ FORM 2.0S STACK INFORMATION
 - _____ FORM 2.0Z OZONE SEASON INFORMATION
 - ☒ FORM 2.1 FUEL COMBUSTION WORKSHEET
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 - ☒ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
 - ☒ FORM 2.4 PETROLEUM LIQUID LOADING WORKSHEET
 - ☒ FORM 2.5 ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
 - ☒ FORM 2.5L GENERAL LIQUID STORAGE TANK INFORMATION
 - ☒ FORM 2.6 ORGANIC LIQUID STORAGE, FLOATING-ROOF TANK WORKSHEET
 - _____ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
 - _____ FORM 2.8 STORAGE PILE WORKSHEET
 - ☒ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
 - ☒ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
 - _____ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
 - ☒ FORM 3.0 EMISSIONS FEE CALCULATION
 - _____ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - _____ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - _____ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - _____ FORM 4.0 FINANCIAL COST ESTIMATE

3. **If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?**

Potentially I would not know about an emission unit/point until arriving at the site.

4. **Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? Yes**
If so, where is it located?

Inspection Forms and facility files, but not always up to date due to time between inspections.

5. **Do you have any suggestions or comments?**

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No
2. What emissions inventory information or EIQ forms do you use?
- ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
 - ☒ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☒ FORM 2.0L LANDFILL INFORMATION
 - ☐ FORM 2.0P PORTABLE PLANT INFORMATION
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 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this ~~effect~~ ^{affect} what you do?
Very little effect
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?
5. Do you have any suggestions or comments?

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?
 - ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☒ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
 - ☐ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☐ FORM 2.0L LANDFILL INFORMATION
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 - ☐ FORM 2.2 INCINERATOR WORKSHEET
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 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

I don't feel it would affect me or my job, (Petroleum Bulk Terminals, MOPETP, Stage II) , but I do think it would affect other inspectors.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

5. Do you have any suggestions or comments?

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

☒ FORM 1.0 GENERAL PLANT INFORMATION
☒ FORM 1.1 PROCESS FLOW DIAGRAM
☒ FORM 1.2 SUMMARY OF EMISSION POINTS
☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
☒ FORM 2.0 EMISSION POINT INFORMATION
☒ FORM 2.0C CONTROL DEVICE INFORMATION
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☒ FORM 2.5L ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
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☐ FORM 3.0 EMISSIONS FEE CALCULATION
☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

If there is an applicable rule or permit condition governing the amount of a pollutant at a source, the lower threshold is necessary.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?

5. Do you have any suggestions or comments?

If sources were required to submit a complete EIQ with Operating Permit applications, and changes when construction permits are issued, the annual EIQ information for fee payment could probably be reduced.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?
 - ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
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 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

No significant. My preference if the threshold is increased would be to leave the emission point information but note that emissions are insignificant.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

5. Do you have any suggestions or comments?

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No
2. What emissions inventory information or EIQ forms do you use?
 - ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
 - ☐ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☒ FORM 2.0L LANDFILL INFORMATION
 - ☐ FORM 2.0P PORTABLE PLANT INFORMATION
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 - ☒ FORM 2.1 FUEL COMBUSTION WORKSHEET
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 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

It would ~~cause the permits section to~~ cause the permits section to have less data (ie, MHDZ, emission factors, control efficiency) to work with. It would create more hassels for trying to get information from the installation.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?
5. Do you have any suggestions or comments?

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. **Do you use any of the information collected on the emissions inventory questionnaire?** ☐ Yes ☒ No

2. **What emissions inventory information or EIQ forms do you use?**
 - ☐ FORM 1.0 GENERAL PLANT INFORMATION
 - ☐ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☐ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☐ FORM 2.0 EMISSION POINT INFORMATION
 - ☐ FORM 2.0C CONTROL DEVICE INFORMATION
 - ☐ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☐ FORM 2.0L LANDFILL INFORMATION
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 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
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 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. **If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?**

It wouldn't.

4. **Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ?** ☐ Yes ☒ No
If so, where is it located?

5. **Do you have any suggestions or comments?** Nope.



EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No
2. What emissions inventory information or EIQ forms do you use?
 - ☐ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☐ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☒ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☐ FORM 2.0C CONTROL DEVICE INFORMATION
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 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
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 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

None directly – might reduce some load if there a lot sources that are in this range. Better, yet, is there a good reason to do this. Or is it just a random selection rounded off. If there is supportable science behind the number than that is what we should use, possibly.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☒ No
If so, where is it located?
5. Do you have any suggestions or comments? No

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. **Do you use any of the information collected on the emissions inventory questionnaire?** ☒ Yes ☐ No
2. **What emissions inventory information or EIQ forms do you use?**
 - ☐ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☐ FORM 1.2 SUMMARY OF EMISSION POINTS
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 - ☒ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
 - ☒ FORM 2.8 STORAGE PILE WORKSHEET
 - ☐ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
 - ☐ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
 - ☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. **If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?**
Not at all. Only look up info for industry that are emitting greater than de minimis levels.
4. **Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ?** ☐ Yes ☐ No
If so, where is it located? Info is contained in CP application as well. If we have a version of the "most updated" flow diagrams, forms, etc., don't care if it's either in CP file or EIQ.
5. **Do you have any suggestions or comments?**
The current structuring of MOIES is totally unusable and non-user friendly. To make the most of the info from the EIQ, pulling the paper copy is presently the easiest way. If we could overhaul MOIES, that would be the biggest help – and make the info retrievable for industry and us.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

☒ FORM 1.0 GENERAL PLANT INFORMATION
☐ FORM 1.1 PROCESS FLOW DIAGRAM
☒ FORM 1.2 SUMMARY OF EMISSION POINTS
☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
☐ FORM 2.0 EMISSION POINT INFORMATION
☐ FORM 2.0C CONTROL DEVICE INFORMATION
☐ FORM 2.0K CHARCOAL KILN INFORMATION
☐ FORM 2.0L LANDFILL INFORMATION
☐ FORM 2.0P PORTABLE PLANT INFORMATION
☐ FORM 2.0S STACK INFORMATION
☐ FORM 2.0Z OZONE SEASON INFORMATION
☐ FORM 2.1 FUEL COMBUSTION WORKSHEET
☐ FORM 2.2 INCINERATOR WORKSHEET
☐ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
☐ FORM 2.4 PETROLEUM LIQUID LOADING WORKSHEET
☐ FORM 2.5 ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
☐ FORM 2.5L GENERAL LIQUID STORAGE TANK INFORMATION
☐ FORM 2.6 ORGANIC LIQUID STORAGE, FLOATING-ROOF TANK WORKSHEET
☐ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
☐ FORM 2.8 STORAGE PILE WORKSHEET
☐ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
☐ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
☐ FORM 3.0 EMISSIONS FEE CALCULATION
☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

probably not at all unless the information about smaller facilities were deleted from the system

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

I don't know if it is easier or not but most of the information I use is found in construction and operating permits.

5. Do you have any suggestions or comments? The EIQ seems to be the biggest report many of these companies do a year. If we could incorporate the some of the more

common reporting requirements such as the Annuals compliance certification and the semiannual monitoring report into the body of the EIQ it might be easier on some industries. Evaluating the combined form might be a problem for APCP staff however.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

☒ FORM 1.0 GENERAL PLANT INFORMATION
☐ FORM 1.1 PROCESS FLOW DIAGRAM
☐ FORM 1.2 SUMMARY OF EMISSION POINTS
☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
☐ FORM 2.0 EMISSION POINT INFORMATION
☐ FORM 2.0C CONTROL DEVICE INFORMATION
☐ FORM 2.0K CHARCOAL KILN INFORMATION
☐ FORM 2.0L LANDFILL INFORMATION
☐ FORM 2.0P PORTABLE PLANT INFORMATION
☐ FORM 2.0S STACK INFORMATION
☐ FORM 2.0Z OZONE SEASON INFORMATION
☐ FORM 2.1 FUEL COMBUSTION WORKSHEET
☐ FORM 2.2 INCINERATOR WORKSHEET
☐ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
☐ FORM 2.4 PETROLEUM LIQUID LOADING WORKSHEET
☐ FORM 2.5 ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
☐ FORM 2.5L GENERAL LIQUID STORAGE TANK INFORMATION
☐ FORM 2.6 ORGANIC LIQUID STORAGE, FLOATING-ROOF TANK WORKSHEET
☐ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
☐ FORM 2.8 STORAGE PILE WORKSHEET
☐ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
☐ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
☐ FORM 3.0 EMISSIONS FEE CALCULATION
☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

It might become more difficult to identify small sources and solicit their input on new rules or rule changes that may affect them. Smaller sources are also important when considering the fiscal impacts of new rules or rule changes.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

5. Do you have any suggestions or comments?

I would like to learn more about EIQs or MoEIS so that I could use them more effectively. A brief workshop for program staff who don't regularly handle EIQs on what is in an EIQ, how to gather information about groups of sources within a source category or within a geographic region, etc. could be very helpful.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No
2. What emissions inventory information or EIQ forms do you use?
 - ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☐ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☐ * FORM 2.0C CONTROL DEVICE INFORMATION
 - ☐ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☐ * FORM 2.0L LANDFILL INFORMATION
 - ☐ FORM 2.0P PORTABLE PLANT INFORMATION
 - ☐ * FORM 2.0S STACK INFORMATION
 - ☐ FORM 2.0Z OZONE SEASON INFORMATION
 - ☒ FORM 2.1 FUEL COMBUSTION WORKSHEET
 - ☐ * FORM 2.2 INCINERATOR WORKSHEET
 - ☒ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
 - ☐ FORM 2.4 PETROLEUM LIQUID LOADING WORKSHEET
 - ☐ FORM 2.5 ORGANIC LIQUID STORAGE, FIXED ROOF TANK WORKSHEET
 - ☐ FORM 2.5L GENERAL LIQUID STORAGE TANK INFORMATION
 - ☐ FORM 2.6 ORGANIC LIQUID STORAGE, FLOATING-ROOF TANK WORKSHEET
 - ☐ FORM 2.7 HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
 - ☐ * FORM 2.8 STORAGE PILE WORKSHEET – *infrequently used - may be referenced for CP review*
 - ☐ FORM 2.9 STACK TEST CONTINUOUS EMISSION MONITORING WORKSHEET
 - ☒ FORM 2.T HAZARDOUS AIR POLLUTANT WORKSHEET
 - ☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - ☒ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE

X frequently used – CP review, inspection preparation, fee calculations, etc
* infrequently used – may be referenced for CP review
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?
 - Depending on how it was implemented, it could reduce fees that we collect
 - Prefer 500lb threshold
 - Allow facilities to group miscellaneous emissions into one point if several EP's fall below new thresholds (even though this is done now, encourage sources to review)
 - If the reporting threshold was 1000 lbs, it would be more difficult to determine ongoing compliance with CP exemption of 876lb/yr actuals
 - Less data entry / Less time spent on EIQs
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☒ Yes ☐ No
If so, where is it located?
 - The Asphalt, Concrete and Quarry construction permit worksheets contain emission factors and throughput information that could be used to calculate annual emissions. Not all forms have been released, so they may not be an alternative to the standard EIQ forms.
5. Do you have any suggestions or comments?
Comments compiled from all Kansas City local staff that work with EIQs.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No
2. What emissions inventory information or EIQ forms do you use?
 - ☒ FORM 1.0 GENERAL PLANT INFORMATION
 - ☒ FORM 1.1 PROCESS FLOW DIAGRAM
 - ☒ FORM 1.2 SUMMARY OF EMISSION POINTS
 - ☒ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
 - ☒ FORM 2.0 EMISSION POINT INFORMATION
 - ☒ FORM 2.0C CONTROL DEVICE INFORMATION
 - ☐ FORM 2.0K CHARCOAL KILN INFORMATION
 - ☐ FORM 2.0L LANDFILL INFORMATION
 - ☐ FORM 2.0P PORTABLE PLANT INFORMATION
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 - ☐ FORM 2.0Z OZONE SEASON INFORMATION
 - ☐ FORM 2.1 FUEL COMBUSTION WORKSHEET
 - ☐ FORM 2.2 INCINERATOR WORKSHEET
 - ☐ FORM 2.3 VOC PROCESS MASS-BALANCE WORKSHEET
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 - ☐ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
 - ☐ FORM 3.0 EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
 - ☐ FORM 4.0 FINANCIAL COST ESTIMATE
3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do? If this is allowed, it will be tougher to make a determination if the facility has constructed without a permit. The process flow diagram and summary of emissions points also help in determining if the facility has constructed without a permit.
4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

5. Do you have any suggestions or comments?

I do not have the time to participate in the subcommittee, however I would like to say I see no need to change anything on the EIQ. I do not always use all the information in the EIQ. I normally use just the general plant information, the process flow diagram, the emission point log, and control device information found on each form 2.0 when conducting inspections. But when I choose to do a more in depth analysis of the facility operations, the EIQ as it stands proves to be very useful.

EMISSIONS INVENTORY QUESTIONNAIRE USAGE SURVEY

1. Do you use any of the information collected on the emissions inventory questionnaire? ☒ Yes ☐ No

2. What emissions inventory information or EIQ forms do you use?

☒ FORM 1.0 GENERAL PLANT INFORMATION
☒ FORM 1.1 PROCESS FLOW DIAGRAM
☒ FORM 1.2 SUMMARY OF EMISSION POINTS
☒ FORM 1.0P COMPANY INFORMATION - PORTABLE EQUIPMENT
☒ FORM 2.0 EMISSION POINT INFORMATION
☒ FORM 2.0C CONTROL DEVICE INFORMATION
☒ FORM 2.0K CHARCOAL KILN INFORMATION
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☒ FORM 2.0 ST LOUIS EMISSION POINT INFORMATION
☒ FORM 3.0 EMISSIONS FEE CALCULATION
☐ FORM 3.0 CHARCOAL KILN EMISSIONS FEE CALCULATION
☐ FORM 3.0 KANSAS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 3.0 ST LOUIS CITY LOCAL AGENCY EMISSIONS FEE CALCULATION
☐ FORM 4.0 FINANCIAL COST ESTIMATE

3. If industry were to be given an increase in their emission point reporting threshold from 200 lbs to 500 lbs or 1000 lbs, how would this effect what you do?

I would leave the reporting threshold unchanged especially for HAPS.

4. Is there any of the emission information listed on the Emissions Inventory Questionnaire (EIQ) easily available elsewhere within the Air Pollution Control Program which could be eliminated from the EIQ? ☐ Yes ☐ No
If so, where is it located?

I don't know. But the EIQ is my first choice to find information about a facility.

5. Do you have any suggestions or comments?